

IN THE
COURT OF APPEALS FOR THE
FIRST JUDICIAL DISTRICT OF TEXAS
AT HOUSTON

FILED IN
1st COURT OF APPEALS
HOUSTON, TEXAS
1/13/2021 2:00:20 AM
CHRISTOPHER A. PRINE
Clerk

RICARDO ROMANO,
Appellant

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§
§
§
§
§

V.

CAUSE NO. 01-18-00538-CR

STATE OF TEXAS
Appellee

APPELLANT'S MOTION FOR LEAVE TO FILE A BRIEF ON REMAND

TO THE HONORABLE FIRST COURT OF APPEALS:

Ricardo Romano, appellant, seeks leave to file a brief on remand from the Court of Criminal Appeals (CCA). Additional briefing will assist the Court in deciding the remaining legal sufficiency issue in light of the CCA's opinion on discretionary review.

Counsel for appellant would have filed this brief before today, but his wife received her second shot of the Covid vaccine on January 6, 2021, and unexpectedly turned ill on January 7. Counsel had to care for her and their two children on January 7 and 8, and then his youngest son became ill on January 11. As a result, counsel was unable to complete the brief on remand until January 12.

Appellant prays that the Court grant this motion and grant him leave to file a brief on remand.

Respectfully submitted,

/s/ Josh Schaffer

Josh Schaffer

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RICARDO ROMANO

CERTIFICATE OF SERVICE

I served a copy of this motion on Cory Stott, assistant district attorney for Harris County, by electronic service on January 12, 2021.

/s/ Josh Schaffer

Josh Schaffer

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Associated Case Party: Ricardo Romano

Name	BarNumber	Email	TimestampSubmitted	Status
Josh Schaffer		josh@joshschafferlaw.com	1/13/2021 2:00:20 AM	SENT

Associated Case Party: Harris County District Attorney's Office

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Cory Stott		Stott_Cory@dao.hctx.net	1/13/2021 2:00:20 AM	SENT